

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

a. one (1) Genuine Gucci Men's  
Chronoscope 101M G Design with  
Stainless Steel Bracelet, Black Dial with  
bezel set, Serial No. 11885892,

b. one (1) 10K Yellow Gold Square  
Foxtail Chain Long Necklace 25.0  
inches Length with Lobster Closing  
Clasp

c. one (1) Men's Fake Rolex  
Watch, Submariner Style 18K All  
Stainless Steel Case and Bracelet Black,  
Inside Bezel or Lugs,

d. one (1) 10K Yellow Gold Cuban  
Style Long Bracelet – Flat Solid Link  
Style 8.50 Inches Length, with box type

e. one (1) 10K Yellow Gold Cuban  
Style Long Bracelet – Flat Solid Link  
Style 25.0 inches long Length with box  
type

f. one (1) 10K Yellow Gold Square  
Foxtail Chain Long Bracelet, 9.25

Civil No.:

Inches Length, with Lobster closing clasp

g. one (1) 10K Yellow Gold Square Foxtail Chain Long Bracelet, 8.5 Inches Length, with Lobster Closing Clasp

h. one (1) Genuine Men's Rolex Watch, Submariner Style 18K Yellow Gold and Stainless Steel Design, Serial No. F181599

i. one (1) Genuine Men's Rolex Watch Submariner Style 18K Yellow Gold and Stainless Steel Design, Serial No. 8LR92128

Defendants *In Rem*.

**VERIFIED COMPLAINT FOR FORFEITURE IN REM**

TO THE HONORABLE COURT:

COMES NOW, the United States of America brings this Verified Complaint for Forfeiture *in Rem* pursuant to Supplemental Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

**Nature of the Action**

1. This is a civil action *in rem* pursuant to:

a. 21 U.S.C. § 881(a)(6) allows for forfeiture of all moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of this subchapter, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of this subchapter.

**Jurisdiction and Venue**

2. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345; over an action for forfeiture pursuant to 28 U.S.C. § 1355; and over this particular action pursuant to 19 U.S.C. §§ 1595a(a) and 1703 and 46 U.S.C. § 70503.

3. Venue is proper in this district and the Court has *in rem* jurisdiction over the defendant currency pursuant to 28 U.S.C. §§ 1355(b)(1)(A) and 1395(b) because the acts and omissions giving rise to the forfeiture occurred in this district.

**The Defendants in Rem**

4. The Defendants *in rem* are:

a. one (1) Genuine Gucci Men's Chronoscope 101M G Design with Stainless Steel Bracelet, Black Dial with bezel set, Serial No. 11885892,

- b. one (1) 10K Yellow Gold Square Foxtail Chain Long Necklace 25.0 inches Length with Lobster Closing Clasp,
- c. one (1) Men's Fake Rolex Watch, Submariner Style 18K All Stainless Steel Case and Bracelet Black, Inside Bezel or Lugs,
- d. one (1) 10K Yellow Gold Cuban Style Long Bracelet – Flat Solid Link Style 8.50 Inches Length, with box type,
- e. one (1) 10K Yellow Gold Cuban Style Long Bracelet – Flat Solid Link Style 25.0 inches long Length with box type,
- f. one (1) 10K Yellow Gold Square Foxtail Chain Long Bracelet, 9.25 Inches Length, with Lobster closing clasp,
- g. one (1) 10K Yellow Gold Square Foxtail Chain Long Bracelet, 8.5 Inches Length, with Lobster Closing Clasp,
- h. one (1) Genuine Men's Rolex Watch, Submariner Style 18K Yellow Gold and Stainless Steel Design, Serial No. F181599,
- i. one (1) Genuine Men's Rolex Watch Submariner Style 18K Yellow Gold and Stainless Steel Design, Serial No. 8LR92128;

The Defendants *in rem* are within the possession, custody, or control of the United States.

### **Facts**

5. The Defendants *in rem* were seized on August 23, 2022, from Eric Manuel FERNANDEZ COLON, AKA “Erito” upon his arrest at his residence located in

Carolina, PR. This Verified Complaint fully incorporates the facts contained in the attached Unsworn Declaration of Special Agent Brennan J. Brumley of the Drug Enforcement Administration.

**Claim for Relief**

6. The United States of America respectfully requests that the Court issue a warrant of arrest for the Defendants *in rem*; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that the Court enter judgment declaring the Defendants *in rem* condemned and forfeited to the United States of America for disposition according to law; and that the Court grant the United States of America such other and further relief as the Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 10<sup>th</sup> day of April 2023.

W. Stephen Muldrow  
United States Attorney

/s/Myriam Y. Fernández-González  
Myriam Y. Fernández-González  
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### VERIFIED DECLARATION

I, Myriam Y. Fernandez-Gonzalez, Assistant United States Attorney, declare pursuant penalty of perjury as provided by 28 U.S.C. § 1746, the following:

That the foregoing Complaint is based on reports and information furnished to me by the Drug Enforcement Agency (DEA); that everything contained therein is true and correct to the best of my knowledge and belief.

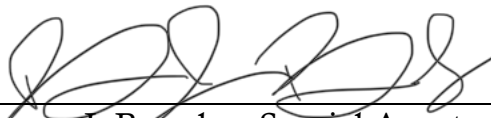
Executed in San Juan, Puerto Rico, this 10<sup>th</sup> day of April 2023.

/s/Myriam Y. Fernández-González  
Myriam Y. Fernández-González  
Assistant United States Attorney

### VERIFICATION

I, Brennan J. Brumley, depose and say that I am a Special Agent with the Drug Enforcement Administration and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *In Rem* and, pursuant to 28 U.S.C. § 1746, verify pursuant to penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in San Juan, Puerto Rico, this \_\_\_\_ day of April 2023.

  
\_\_\_\_\_  
Brennan J. Brumley, Special Agent  
Drug Enforcement Administration  
(DEA)